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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

January 10, 1997

Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: CC Docket 96-45 - Universal Service

Dear Mr. Caton:

Enclosed for filing please find an original and four copies of the Reply Comments of ALLTEL Telephone Services Corporation, in the referenced rulemaking proceeding.

Please address any questions respecting this matter to the undersigned counsel.

Very truly yours,

Carolyn Hill

Carolyn C. Hill

CCH/ss

Enclosures

cc: Ms. Sheryl Todd (w/diskette)
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**Before
the Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

**REPLY COMMENTS OF
ALLTEL TELEPHONE SERVICES CORPORATION**

ALLTEL Telephone Services Corporation, on behalf of its affiliated local exchange companies (hereinafter "ALLTEL" or the "ALLTEL Companies"), respectfully submits its reply comments to the comments filed on December 19, 1996 in the above-captioned matter.

Introduction

As set forth in ALLTEL's comments, there are some glaring omissions in the Joint Board's Recommended Decision ("RD") which, if not correctly addressed, will profoundly affect the incentives of LECs to continue to provide and advance universal service. To name but a few of these omissions - the size of the high cost fund remains an unknown as does the basis of telecommunications carriers' contributions - is it retail revenues as advocated by ALLTEL and many others ¹ or is it gross revenues net of

¹ See, for example, AT&T (pgs. 8-10) and USTA (pgs. 15-16)

payment to other carriers as argued by resellers?² There is also the question of the jurisdictional origin of these revenues - are they interstate or interstate and intrastate? This is followed by the lingering question of how telecommunications carriers recover their contributions. This question, in the eyes of many, including ALLTEL, is answered by requiring that an explicit surcharge be used rather than disguising the costs of supporting universal service.³

There is also the fundamental question of cost recovery by incumbent LECs of their investment in facilities which heretofore have been used in the provision of universal service as part of a social compact with regulators at both the state and federal level. And, as a last example, there is the issue of proxy models. These have spawned a growing industry; they are populated by the latest impenetrable codes; but they have not succeeded in capturing the costs of all the universal service participants.

Many of the fallacies and deficiencies of the proxies currently before the Commission were noted in the earlier filed comments.⁴ However, as discussed below, the impact on the rural LECs of these deficiencies must not be ignored if the Commission is to comply with the requirements of the 96 Act that its policies preserve and advance universal service.

² Telecommunications Resellers Association (p.5)

³ See, for example, AT&T (pgs. 8-10), WORLDCOM (pg. 40) and USTA (pgs. 15-16)

⁴ GVNW (p.12), Harris Skirvan and Associates (pgs. 3-4), ICORE (pgs. 5-6), Puerto Rico Telephone Company (pgs. 25-26), Roseville Telephone Company (p. 13), Rural Telephone Coalition (pgs. 4-10), TDS Telecom (pgs. 15-16)

I. Proxies as Currently Developed Do Not Work for Rural LECs

In its comments, Ameritech has advocated the elimination of the three year freeze proposed by the Joint Board before rural LECs would begin a transition to proxies. Instead, Ameritech has proposed that rural LECs should immediately begin the three year transition to proxies. (Ameritech comments p. 13) ALLTEL opposes this because existing proxy models do not depict or predict the rural LECs costs. (See also the comments of Harris, Skrivan and Associates p. 3-4 and GVNW p. 12.) The Hatfield proxy model which AT&T and MCI developed and have long been proponents does not produce any rural company cost data; hence, it is an unacceptable candidate for consideration as a proxy model for rural LECs. As acknowledged by the Wyoming Public Service Commission, "one size does not fit all", and if this is the case, then perhaps two sizes are needed.⁵ ALLTEL agrees. ALLTEL believes that for any proxy model to receive serious consideration as a valid one, there must be two sets of inputs: one for the rural LECs and one for the non-rural LECs. This remains to be done, and until a proxy model can generate universal service costs separately for both rural and non-rural LECs, no proxy should be approved.

II. Payment of Universal Service Support to Resellers is Inconsistent with the 96 Act and Competitive Neutrality

In the comments of certain resellers, such as Excel (p.5) and the Telecommunications Resellers Association (p.10), the argument is made that the Commission should expand the Joint Board's Recommended Decision to include non-facilities-based providers as carriers eligible to receive universal service support.

⁵ Wyoming PCS (p.7)

ALLTEL disagrees. As noted in ALLTEL's comments and those of others, such as Roseville Telephone (pgs. 15-17), universal support is already reflected in the incumbent LEC's local rates. The cost to the reseller is the incumbent LECs' discounted local tariff rate. Thus, to allow the reseller to also receive universal service funding results in the proverbial two "bites of the apple" and serves only to transform the apple into an orchard. Further, undermining the validity of this argument is Section 214(e)(1)(A) of the Communications Act. It limits consideration as an eligible carrier for universal service funding to carriers using their own facilities or a combination of their facilities and resale of another carrier's service (including the services offered by another eligible carrier). Thus, ALLTEL submits it was not the intent of the 96 Act that resellers be eligible for universal service funding. Moreover, even in the situation of a competitive carrier using a combination of its facilities and reselling the services of another eligible carrier, only those facilities owned and used by the competitive carrier in the provision of universal service should be eligible for support. Finally, the exclusion of resellers from universal service support does not violate the principle of competitive neutrality, as envisioned by the Joint Board, by allegedly putting resellers at a competitive disadvantage. As stated earlier, the wholesale rates resellers pay any underlying carrier already reflect universal service support. What would violate competitive neutrality is resellers receiving the benefits of universal service payments in the rates they pay the underlying carrier and then collecting universal service support for resold services.

III. AT&T's Proposed Federal Certification Process for Rural LECs is Contrary to the 96 Act

In the Joint Board's Recommended Decision, the Joint Board, for the purpose of universal service payments, adopted the definition of "rural telephone company" set forth in Section 153(37) of the Communications Act. Further, it recommended that in order for the universal service fund administrator to know which carriers should receive support payments based on proxy models or embedded costs, rural LECs should notify the FCC and their state commission that they meet the statutory definition of a "rural telephone company". (RD. p. 150-151). AT&T, however, claims that without a "thorough verification process, such a voluntary compliance system would be unacceptably prone to abuse." AT&T comments (p. 27). To remedy this, AT&T proposes that the Commission establish a formal carrier certification process consisting of each carrier notifying the federal and applicable state commissions, followed by the opportunity for interested parties to respond. Then, assuming the FCC is satisfied that the carrier meets the statutory definition, the Commission will issue an order granting this "special status". Further, the process will be reopened if a rural carrier enters into a merger or acquisition. (*Id* at 27-28).

There is no basis to support AT&T's attempt to convert a straightforward process for receipt of universal service funding into a protracted paper-laden process. AT&T's proposal, in ALLTEL's view, is but one more attempt to circumvent the authority given to the state commissions under the 96 Act. Under Section 214(e) of the Communications Act, the duty to determine carriers eligible for universal service funding, including carriers meeting the definition of a "rural telephone company", is

one that resides with the state commissions. The only thing that possibly could be accomplished by adoption of AT&T's proposal is to permit AT&T, at its whim, to delay universal service funding to rural LECs. Accordingly, ALLTEL submits that AT&T's proposal should not be adopted.

Conclusion

In its upcoming deliberations on universal service, ALLTEL encourages the Commission to be mindful of the objectives of the Congress in adopting the universal service principles contained in the 96 Act as well as the accompanying directives to the Commission to adopt policies that preserve and advance universal service. The Commission, in this effort, should not be diverted by proposals that fail to give recognition to the actual costs incurred by rural LECs in the provision of universal service, by proposals that rely on untested and unverified proxies, or by proposals that seek merely to hamstring rural LECs in their provision of universal service.

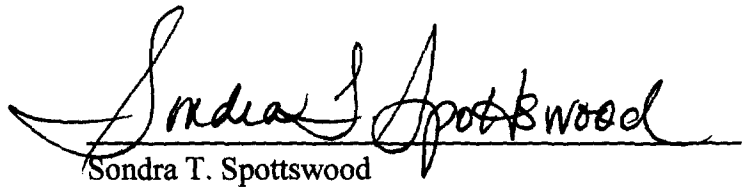
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CERTIFICATE OF SERVICE

I, Sondra T. Spottswood, hereby certify that a copy of the foregoing "Reply Comments of ALLTEL Telephone Services Corporation" was mailed this 10th day of January, 1997, via U.S. mail, first-class, postage prepaid, to the following persons, unless otherwise noted:


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